

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

v.)

Crim. No. 04-30020-MAP

MARIO ESPINO,)

Defendant.)

**GOVERNMENT'S MOTION TO IMPOUND AND ACCEPT FOR IN CAMERA REVIEW
ITS RESPONSE TO DEFENDANT'S MOTION TO COMPEL DISCLOSURE
OF UNINDICTED CO-CONSPIRATORS AND ANY OTHER
UNNAMED COOPERATING WITNESSES**

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully moves this Court to impound the Government's *Ex Parte* Response To Defendant's Motion To Compel Disclosure of Unindicted Co-Conspirators and Any Other Unnamed Cooperating Witnesses (the "Response"), and to allow the government to submit its response for *in camera* review, pursuant to Local Rule 116.6(A) and 7.2.

As grounds for this motion, the government states that it is seeking to protect information that is contained its Response that it has declined to disclose in automatic discovery, pursuant to Local Rule 116.6. The government proposes to submit its Response before the close of business on August 27, 2004, and intends to provide the defendant with a redacted copy, as is required under Local Rule 116.6(A).

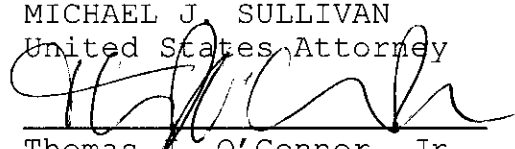
The government requests that its Response be held under seal

until further order of the Court.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:


Thomas J. O'Connor, Jr.
Assistant U.S. Attorney

Dated: August 26, 2003

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by fax to (413) 586-6619, and by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Atty. Elaine M. Pourinski
13 Old South Street
Northampton, MA 01060

This 26th day of August, 2004.


Thomas J. O'Connor, Jr.
ASSISTANT U.S. ATTORNEY